

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

VALTRUS INNOVATIONS LTD.

vs.

AT&T INC., ET AL.

CIVIL ACTION NO. 2:23-CV-0443-JRG
(Lead Case)

JOINT MOTION TO EXTEND CERTAIN DEADLINES

Plaintiff Valtrus Innovations Ltd and, Defendants T-Mobile USA, Inc. T-Mobile US, Inc., Sprint Corp., OnePlus Technology (Shenzhen) Co. Ltd., and OnePlus Mobile Communications (Guangdong) Co., Ltd. jointly move to extend certain deadlines shown in the chart below. The parties request the following deadlines be extended as follows:

Current Deadline	Proposed Deadline	Event
December 18, 2023	January 12, 2024	File Proposed Discovery Order
December 26, 2023	January 19, 2024	File Proposed Protective Order

The parties submit that good cause exists for the proposed extension. Among other things, the consolidated cases involve three sets of Defendants for which the issues addressed in the Discovery Order and Protective Order raise separate issues. For example, Plaintiff asserts nine patents against the Verizon and T-Mobile Defendants but only four patents against the OnePlus Defendants. The parties continue to discuss how, if at all, the default limits set forth in the discovery order should be altered to account for the scope of the case against the Verizon and T-Mobile Defendants without unduly burdening the OnePlus Defendants, given the relatively narrow scope of the case. Additionally, notwithstanding the above, the parties agree that discovery may begin on December 26, 2023, as would otherwise be the case if the deadlines were not moved. Accordingly, the requested extensions will not affect the remaining schedule.

Dated: December 15, 2023

Respectfully submitted,

By: /s/ Jeffrey J. Catalano

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CERTIFICATE OF SERVICE

I, an attorney, hereby certify that on December 15, 2023, I caused a true and correct copy of the foregoing Motion to be served upon all counsel of record who are deemed to have consented to electronic service via the Court's electronic filing system.

/s/ Melissa R. Smith

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel for Defendants met and conferred with counsel for Plaintiff to discuss the substantive issues addressed in this Motion pursuant to Local Rule CV-7(h-i). The Parties are jointly seeking the relief sought in this Motion.

/s/ Melissa R. Smith